



June 27, 2017

VIA ECF

Honorable Shelley C. Chapman  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004

Re: *Lehman Brothers Holdings Inc. v. 1st Advantage Mortgage, L.L.C.*  
Adv. Proc. No. 16-01019 (SCC) (the "Omnibus Action")

*Lehman Brothers Holdings Inc. v. iFreedom Direct Corporation (f/k/a New  
Freedom Mortgage Corporation),*  
Adv. Proc. No. 15-01426 (SCC)

*Lehman Brothers Holdings Inc. v. WEI Mortgage LLC f/k/a WEI Mortgage  
Corporation,*  
Adv. Proc. No. 16-01346 (SCC)

Notice of Decision in a Related Matter

Dear Judge Chapman:

This firm and Wollmuth Maher & Deutsch LLP represent Lehman Brothers Holdings Inc. ("LBHI") in the above-referenced adversary proceeding and related adversary cases in which LBHI is pursuing Indemnification Claims. Plaintiff LBHI respectfully submits this notice of supplemental authorities to support LBHI's opposition to iFreedom Direct Corporation's ("iFreedom") motion to dismiss (ECF 22) and LBHI's opposition to WEI Mortgage LLC's ("WEI") motion to dismiss (ECF 14).

iFreedom filed a separate collateral action against LBHI in the United States District Court of Utah. *iFreedom Direct Corp. v. LBHI*, No. 15-cv-00868-TC, ECF No. 2 (D. Utah Dec. 10, 2015). After a hearing, the Utah court granted LBHI's motion to dismiss the parallel Utah action without prejudice in favor of the pending action before this Court. *Id.*, ECF No. 59 (D. Utah June

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23, 2017). In the opinion, the Utah court distinguished the Tenth Circuit's ruling in *LBHI v. Universal American Mortgage Co.*, 660 F. App'x 554 (10th Cir. 2016), which is a focus of WEI's motion to dismiss. The opinion is attached as **Exhibit 1** as supplemental authority.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Michael A. Rollin". The signature is fluid and cursive, with the first name "Michael" and last name "Rollin" being the most prominent parts.

Michael A Rollin

Attachment

cc: All parties (via ECF)

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